

The Tobacco Institute

1875 I Street, Northwest
Washington, DC 20006
(800) 424-9876

**IMPORTANT QUESTIONS ON EPA'S RISK ASSESSMENT
ON ENVIRONMENTAL TOBACCO SMOKE (ETS)**

- 1) Given the Agency's longstanding credibility problems, including those recognized recently by an expert panel convened by the previous Administrator, how could EPA release a report that is not supported by the majority of the studies on lung cancer that were reviewed?
 - Of the 30 lung cancer studies reviewed by EPA, 24 do not report statistically significant increases in risk.
 - The Administrator's expert panel, in a report entitled "Safeguarding the Future: Credible Science, Credible Decisions," found that "EPA science is of uneven quality and the Agency's policies and regulations are frequently perceived as lacking a strong foundation." The panel also noted that "science should never be adjusted to fit policy, either consciously or unconsciously."
- 2) Isn't it true that of the 11 U.S. lung cancer studies reviewed by the EPA, not one originally reported an overall statistically significant increase in risk?
 - EPA acknowledged previously that the U.S. studies do not convincingly support the contention that ETS exposure increases nonsmoker lung cancer risk. EPA lowered its statistical standard to reach a contrary -- politically correct -- conclusion.
 - The statistical standard in question involves EPA's novel use of a 90 percent confidence interval. Generally accepted conventions require the use of a 95 percent confidence interval. Weakening this standard is the equivalent of a bell-curve in test grading -- the standard is lowered to achieve the desired result.
- 3) Isn't it true that the most recent ETS study published, one of the largest studies to date and funded by the National Cancer Institute, reported no over-all statistically significant increase in risk?
 - This study, published in November 1992 in the American Journal of Public Health, reported no over-all statistically significant increase in risk between lung cancer and reported ETS exposure.
 - In fact, the majority of the most recent ETS studies fail to demonstrate a statistically significant association between ETS and nonsmoker lung cancer. Many scientists have pointed out that these newer studies are larger and better designed than previous studies.

2024678795

The Tobacco Institute

1875 I Street, Northwest
Washington, DC 20006
(800) 424-9876

- 4) If the ETS studies published since the EPA's review were included, wouldn't the conclusions be dramatically different?
 - Yes. If the data from the two new published studies were included, the EPA's meta-analysis of U.S. studies would not be statistically significant.
- 5) Doesn't one of the approaches of the risk assessment — using the smoke to which a smoker is exposed to suggest the plausibility of the claim that ETS is a Group A carcinogen — set an untenable precedent?
 - The report concedes substantial physical and chemical differences between the mainstream smoke to which smokers are exposed and the ETS to which nonsmokers may be exposed. The report also concedes enormous differences in the levels and routes of exposures.
 - Classification of ETS as a Group A carcinogen based on comparisons of the smoke to which a smoker is exposed and nonsmoker ETS exposure, sets an untenable precedent. If the fact that something — in this case ETS — contains any of the same substances as mainstream smoke was the basis for a "Group A" label, then the air in every building and home, drinking water, hamburgers, peanut butter and many other every day products could also be classified Group A.

2024678796